

# *Appendix L*

## *Summary of Public Concerns and Responses*

### *September 6, 2006*

This appendix summarizes public comments on the California Wildlife Action Plan. The Plan was released for public review on May 5, 2006 and the California Department of Fish and Game accepted comments until July 24, 2006. Written comments were received at three public meetings, by U.S. mail, and via electronic mail.

Comments were received from four academic institutions, three federal agencies, nine local agencies, three state agencies, one tribe, twenty-seven non-governmental organizations, and twenty-seven unique letters from individuals, in addition to statements made at public meetings. A form letter from the Defenders of Wildlife (DOW) was received from 3,879 individuals, with fifteen of those individuals providing additional concerns not in the DOW template letter.

These letters and public statements contained 710 separate comments. These comments were categorized into 317 general concern statements. Fourteen of these concern statements dealt with overall project or report development issues, whereas the remainder focused on specific report content. The topics with the highest number of different concern statements were species at risk, stressors, monitoring, assessment, and adaptive management, local and regional planning, invasive species, grazing/working lands, and fire management.

This Response to Public Comments summary is divided into comments that deal first with overall project or report development issues and second report content. Within the report content section, the first section lists concerns that cover multiple chapters or the full report, followed by a second section that lists concerns specific to individual chapters. Within each section, concerns are organized by a broader concern category to keep similar concerns closer together. Each public concern statement is followed by a response.

Concern Category	Public Concern	Response
<b>Process/Project Concerns</b>		
Funding	Reader is supportive of the Fish and Game Fisheries Restoration Grant Program	Comment noted.
	Reader is uncertain about how plan implementation will be funded; The Department should fund existing programs before starting new programs and reallocate spending towards plan; Agencies should fund and collaborate with rural counties	The Wildlife Action Plan is intended to point out actions that could be funded in a collaborative manner by many different agencies and organizations. Many of the actions are currently funded although some could benefit from additional funding. State Wildlife Grant funds represent a small percent of funds available for department declining and vulnerable species management and recovery efforts and existing funding is insufficient to address all of the actions in the plan. Additional funding sources for priority actions and programs will be addressed during the plan implementation phase. These sources may include other grant solicitations, interagency funding agreements, or requests for budget augmentations to leverage existing funding.
Future updates - inform me	Keep me informed about further development and the implementation of the Action Plan	As part of priority implementation, the Department will continue to conduct public outreach to keep interested organizations and citizens informed and engaged.
Implementation	Reader encourages Department to implement the plan	Comment noted.
	The report should build on efforts by others and acknowledge active role of other organizations	Most actions identified in the Wildlife Action Plan refer to efforts that would require collaboration to implement. The Department intends to aggressively seek collaborative opportunities and augmentation of existing efforts as part of priority implementation.
	Reader is uncertain about how plan will be implemented	This Wildlife Action Plan is intended as a framework for identifying those species most needing conservation and developing actions and approaches that could effect conservation. Although called a plan, the plan is, by design, a statewide framework and lacks the specificity typically found in a plan that is intended for direct implementation. The Department intends to develop priority implementation elements that would describe goals and objectives for implementation.

<i>Concern Category</i>	<i>Public Concern</i>	<i>Response</i>
Peer-reviewed sources	The report should build on knowledge of others; Cite more peer-reviewed sources; conduct more peer-review of the report	The Wildlife Action Plan is not intended as a complete or exhaustive review of available literature on any topic or issue area. The plan relies on a selection of literature that serves to illustrate a point or provide examples of issues.
Public participation	General concern about issue, no change requested to report	Comment noted.
	Make it easier for public to participate	The Department held a series of public workshops as part of the Resources Agency Legacy Project during 2002 and 2003 that addressed most of the issues and actions contemplated in the plan. The comments received during this broad public involvement effort were incorporated into the draft plan. In addition, the Department conducted three public workshops to gather input on the draft and made the draft available on the Department web site for public review. The Department intends to fully engage the public as part of priority implementation.
	The Department should provide another public comment period for revised draft	The Department is under a mandated deadline to submit the Wildlife Action Plan to the U.S. Fish and Wildlife Service as part of the requirement to continue to receive State Wildlife grant funding. There is insufficient time for extending the comment period while meeting this deadline. Additional public comment and involvement will be available during priority implementation.
	The report needs more public participation; Failure to abide by congressional mandate for public participation; Important organizations not consulted; Legacy workshop don't count as public participation in this plan	See above responses on public participation. Appendix B provides a description of the public participation used in the development of this Wildlife Action Plan. Although efforts were made to reach out to many different organizations, it was difficult to engage the full breadth of groups adequately, given the USFWS timeline and the Department resources available.
Tone	The report implies that people don't care about environment	Comment noted.

Concern Category	Public Concern	Response
Update plan more frequently	More frequent updates of this report are needed	The Department is required by the U.S. Fish and Wildlife Service to update the Wildlife Action Plan every 10 years. However, priority implementation may provide opportunities for updates

## Report Content Concerns

### Multiple Chapters

Acquisition of land	Acquisition should be used cautiously; less flexible with environmental changes due to climate change; Department should demonstrate it can manage lands it already owns; land acquisition has negative impacts on others	Several public agencies and nonprofit organizations include land acquisition as part of their mission and will continue to pursue acquisition in ways that help achieve mission goals to benefit natural resources and effect conservation.
	The report should promote use of conservation easements	The Wildlife Action Plan identifies several opportunities for using conservation easements as part of a comprehensive conservation program. See South Coast Action h; Central Coast Actions d and e; Sierra Nevada - Cascades Action b; Central Valley Actions d, e and I; and Colorado Desert Actions c and h.
	The report should promote use of federal cooperative land-buffering	The Wildlife Action Plan identifies several opportunities for using land-buffering as part of a comprehensive conservation program. See the South Coast chapter (Action h), particularly as it describes the area around Camp Pendleton. It was also added to the statewide discussion as a conservation action.

<i>Concern Category</i>	<i>Public Concern</i>	<i>Response</i>
Amphibians and Trout Planting	Planting trout is an appropriate management practice, contrary to report statements	The Wildlife Action plan addresses identification of species with the greatest conservation need and develops recommended actions to meet this need. While plan actions focus on non-game wildlife, all species would benefit from the conservation actions contemplated in the plan. In addition to conservation and management of non-game wildlife, the Department is mandated to provide recreational angling opportunities and has programs in place to minimize conflicts between providing these recreational opportunities and natural resource conservation.
Climate change	General concern about issue, no change requested to report	Comment noted.
Education	Need more public environmental education	Comment noted.
Enforcement	The report needs to advocate for more enforcement funding	The Wildlife Action Plan describes the need for more funding for enforcement in the Conservation Capabilities chapter. Edits were made to describe the role of enforcement in conservation. See Statewide Action q, Marine Action I, and Central Valley Actions I and q.
Fire management	Actions concerning prescribed burning will face significant difficulties	Comment noted.
	General concern about issue, no change requested to report	Comment noted.

Concern Category	Public Concern	Response
Fish and Game Commission	The Commission needs to be less political	The California Fish and Game Commission is composed of five members, appointed by the Governor and confirmed by the Senate. The Commissioners are not full-time State employees, but individuals involved in private enterprise with expertise in various wildlife-related fields. A major responsibility of the Commission is the formulation of general policies governing Department programs. This is the only area in which the Commission is directly involved in Department administration. Its policies concern fisheries and wildlife management, introduction of exotics, use of departmentally-administered lands and a variety of other subjects. The Commissioners' ultimate decisions must reflect not only the biological needs of our fish and wildlife, but also the wishes, needs and desires of all those who enjoy these resources.
Goals	General concern about issue, no change requested to report	Comment noted.
	The report needs specific measurable goals to measure success	This Wildlife Action Plan is intended as a framework for identifying those species most needing conservation and developing actions and approaches that could effect conservation. Although called a plan, the plan is, by design, a statewide framework and lacks the specificity typically found in a plan that is intended for direct implementation. The Department intends to develop priority implementation elements that would describe goals and objectives for implementation.
Grazing/ Working lands	The report should acknowledge reduction of grazing in Mojave	The Wildlife Action Plan acknowledges the reductions in allowable grazing in recent years in the Mojave chapter.
	The report has contradictory statements about livestock reducing instream flows related to coho	The coho salmon recovery strategy proposes off-sight storage during peak flows to minimize drafting during summer flow, impacting over-summering juvenile fish.

Concern Category	Public Concern	Response
	The report has contradictory statements about value and threats of agriculture	Agricultural practices vary considerably in their impacts, depending on practices, how and when they are applied, and the species that may be affected. Some species have adapted well to agricultural landscapes, while others have been substantially impacted or extirpated as agriculture replaces native habitat. Farmers have been, and can be, valuable partners in conserving wildlife in agricultural lands. The plan identifies opportunities for working landscape partnerships the Department and other state and federal agencies can pursue.
	The report has contradictory statements about value and threats of grazing; It has too much emphasis on incompatibility of wildlife on working lands; Grazing get unnecessarily blamed for weeds; The report needs to mention benefits of properly managed grazing; The report should provide more emphasis on collaboration and incentives; Expand discussion of positive examples; mention non-State conservation efforts on private lands	The Wildlife Action Plan recognizes that economically productive lands (private and public) can be part of wildlife conservation (grazing, agriculture, timber). The USFWS required the Plan to focus on stressors and actions. Where space permitted, the Department attempted to go beyond simple identification and to recognize good examples of compatible wildlife and working land uses. In terms of grazing, the Plan focuses on grazing that is detrimental to wildlife, not all types of grazing. Grazing operations vary considerably in their impacts, depending on practices, how and when they are applied, and the species that may be affected. Some species have adapted well to grazing, while others have been impacted or extirpated as a result of intense and unmanaged grazing practices. Ranchers have been, and can be, valuable partners in conserving wildlife in agricultural lands. The plan identifies opportunities for working landscape partnerships the Department and other state and federal agencies can pursue. Edits were made in each chapter that identified excessive grazing as a stressor to clarify this focus and the variety of effects that grazing has on wildlife.
	General concern about issue, no change requested to report	Comment noted.
	Reader supports variety of recommendations, including invasive species control	Comment noted.

Concern Category	Public Concern	Response
	The report cites an inappropriate source of information	Corrective edits were made in Central Coast chapter.
	The report does not reflect intent of Rangeland Coalition	The Wildlife Action Plan contains no apparent conflicts with the resolution. This Wildlife Action Plan promotes private land practices (Central Coast Actions b and c). These elements of the Plan are key parts of intent of the Coalition. The Department is currently actively engaged with the Coalition to develop “safe harbor” agreements and other streamlined approaches to permitting and environmental compliance to promote the goals outlined in the Rangeland Coalition Statement of Principles.
	The report has too little mention of grazing on public lands	Those regions where grazing is listed are primarily public lands, so actions apply to those lands.
	The report has unsupported claims that grazing damages all land bird habitat	Edits were made to Sierra Nevada - Cascades chapter.
	The report has unsupported claims that grazing damages oak habitat	Corrective edits were made in Central Coast chapter.
	The report misses important research findings	The Wildlife Action Plan is not intended as a complete or exhaustive review of available literature on any topic or issue area. The plan relies on a selection of literature that serves to illustrate a point or provide examples of issues.
	The report needs discussion of undergrazing as a stressor	The Wildlife Action Plan was edited in several places to expand on the value of grazing in maintaining wildlife and vegetation.
	The report needs discussion of wildlife as grazers	The Wildlife Action Plan lists other species as important grazers. For example, see descriptions of burros in Colorado Desert chapter, feral horses in Modoc chapter, deer in Sierra Nevada - Cascades chapter, and elk in Modoc chapter.



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	The report needs to recommend that certification and labeling programs be led by operators, not government	Edits were made in Central Coast chapter.
	The report should address impacts of agriculture on wildlife	The impacts of agriculture to wildlife are described throughout the Wildlife Action Plan.
	The report should focus on current threats, not historic impacts	Both historic and current threats are included in the plan to provide a context of the effect of stressors on wildlife populations.
	The report should promote partnerships rather than land retirement programs	The plan describes a variety of mechanisms that promote or effect conservation. A variety of conservation approaches are needed to provide flexibility in different situations.
	The report should provide more emphasis on collaboration and incentives; Expand discussion of positive examples; mention non-State conservation efforts on private lands	A new statewide action was added related to assisting private landowners. Other edits were made to recognize the role of private landowners in conservation, including the role of farmers in the Central Coast chapter, their involvement in conservation efforts in the Sierra Nevada - Cascades chapter, and in the Central Valley and Bay Delta chapter
	The report should recognize value of agriculture and ranching industry	Comment noted.

	The report uses undefined or inappropriate terms to describe grazing, agriculture, and forestry stressors; Concern about government prescribing grazing recommendations	The primary purpose of the plan is to identify species in most need of conservation, identify stressors related to population declines, and recommend actions that would effect conservation of those species. As such, describing beneficial activities or current conservation efforts, except in the context of developing appropriate actions, is beyond the scope of the plan. Terms are more clearly defined and described as a result of several edits throughout the document to provide clarity in describing conservation actions and stressors.
Habitat analysis and description	The report should include more information about habitat condition and location	A complete description of the location, extent, and condition of wildlife habitat in California is beyond the scope of the plan. The Department and other state and federal agencies support programs designed to inventory and report on wildlife habitat locations and conditions and should be consulted for this information.
Hunting and fishing	General concern about issue, no change requested to report	Comment noted.
	The report should include hunting policies and their impact in the report	The Wildlife Action plan addresses identification of species with the greatest conservation need and develops recommended actions to meet this need. While plan actions focus on non-game wildlife, all species would benefit from the conservation actions contemplated in the plan. In addition to conservation and management of non-game wildlife, the Department is mandated to provide recreational angling opportunities and has programs in place to minimize conflicts between providing these recreational opportunities and natural resource conservation.
	The report should recommend more control in the spread of wild turkeys	The Wildlife Action plan addresses identification of species with the greatest conservation need and develops recommended actions to meet this need. While plan actions focus on non-game wildlife, all species would benefit from the conservation actions contemplated in the plan. In addition to conservation and management of non-game wildlife, the Department is mandated to provide recreational hunting opportunities and has programs in place to minimize conflicts between providing these recreational opportunities and natural resource conservation
Implementation	The report should build on efforts by others and acknowledge active role of other organizations	Most actions identified in the Wildlife Action Plan refer to efforts that would require collaboration to implement. The Department intends to aggressively seek collaborative opportunities and augmentation of existing efforts as part of priority implementation.
Invasive Species	The report should add an action to eradicate invasive species	Edits were made to reflect eradication, as well as control, of invasive species as a conservation action

	The report should add visibility to use of weed-free products	Edits were made in Statewide Actions chapter.
	The report should add information about impacts of live animal markets as source for invasive species; Promote use of hunting to control invasive species; Report needs more visible multi-agency effort to control invasive species; Report needs strategy for controlling Brown-headed cowbird; Designate pets as invasive species; Need action taken on African clawed frogs	<p>The Wildlife Action Plan highlights the invasive species issue in many different places, but it is intended as a framework and does not go into considerable detail on this topic. These ideas can be discussed during the implementation phase, though, where its merits can be discussed with others.</p> <p>Designating individual species or groups of species as invasive species and developing specific prescriptive measures are beyond the scope of the document. Species are designated as invasive through a separate regulatory process.</p>
	General concern about issue, no change requested to report	Comment noted.
	Invasive plants - general concern - No change requested	Comment noted.
	The report should provide more practical ideas to solve problems	Comment noted.
	Reader supports variety of recommendations, including invasive species control	Comment noted.
Jargon, Readability of Report	Reader found it difficult to link actions to stressors	The Department will prepare selected plan summaries as part of the priority implementation process to more clearly link actions with stressors.
	The report is not easily readable	The Department will prepare selected plan summaries as part of the priority implementation process.

Landowner assistance	Landowners need assistance with permitting	The primary purpose of the plan is to identify species in most need of conservation, identify stressors related to population declines, and recommend actions that would effect conservation of those species. As such, describing specific permitting assistance programs is beyond the scope of the plan
Linkages of Habitat	The report should mention Missing Linkages Project; Expand linkages recommendation to statewide list	Edits were made in Statewide Actions chapter.
	The report should promote wildlife linkages and provide more information about linkages, including analysis of mitigation fragments, value of power line corridors, specific locations; identify role of large public land managers and assist them in protecting linkages	The Wildlife Action Plan provides a statewide action (d) regarding wildlife linkages, calling for more analysis of these areas and increased attention to conserve them. These actions can be further developed during the priority implementation process to provide more specific linkage information.
	The report should recommend that new roads provide wildlife crossings	The Wildlife Action Plan addresses this concern with actions that encourage integrating transportation planning and wildlife conservation planning (Statewide Action c)
Local and regional planning	The report should acknowledge need for flexibility and sensitivity to local communities	Flexibility, monitoring, adaptive management and working with local government are key aspects of the chapters on monitoring and conservation capabilities.
	The report should ensure a role of local communities in achieving Action Plan goals.	The Wildlife Action Plan mentions the importance of local government involvement in many chapters and under several actions.
	The report should recommend the establishment of an NCCP Landowner Stewardship Working Group	The primary purpose of the plan is to identify species in most need of conservation, identify stressors related to population declines, and recommend actions that would effect conservation of those species. As such, describing specific stewardship programs is beyond the scope of the plan.

	The report should expand use of Habitat Conservation Plans (HCPs) into rural counties	The NCCP and HCP options for providing incidental take coverage of listed species are available to any entity desiring them.
	General concern about issue, no change requested to report	Comment noted.
	The report should include infrastructure planning as a statewide recommendation, not just regional	Edits were made in Statewide Actions chapter.
	Regional planning may not always be appropriate	Regional planning is just one of many approaches listed in the Wildlife Action Plan.
	The report has an over reliance on Natural Community Conservation Plans (NCCPs)	NCCPs are just one of many approaches that are listed in the Wildlife Action Plan.
Mapping priority areas	The report should provide maps of priority areas	The report is intended as a framework for identifying those species most needing conservation and developing actions and approaches that could effect conservation. Although called a plan, the plan is, by design, a statewide framework and lacks the specificity typically found in a plan that is intended for direct implementation. The Department intends to develop priority implementation elements that would describe goals and objectives for implementation. Funding permitting, the Department will develop maps and other illustrative elements when specific priority plans are developed.
Military Lands	The report should expand expanded partnerships with military	The plan is intended as a framework or roadmap for implementing a series of actions designed to effect conservation of declining and vulnerable species. Although the Department prepared the plan as part of a requirement to the U.S. Fish and Wildlife Service for State Wildlife grant funding, it is designed to be a comprehensive review of conservation actions and stressors that could be implemented by any agency or organization. Effective implementation of these actions will require partnerships between these agencies and organizations. The Department has established several productive inter-agency and non-governmental organization partnerships and will continue to promote these partnerships as part of its conservation mission.
	The report should explain the "non-binding" status of military land management	The Mojave Desert Region chapter mentions that state and federal wildlife agency input is advisory.

	plans	
	Need to protect training corridors	Comment noted.
Monitoring, Assessment, and Adaptive Management	The report should build on existing monitoring efforts	The Wildlife Action Plan recognizes many different existing monitoring efforts. See the monitoring chapter and appendices. Building on these efforts will be a key part of the priority implementation phase.
	General concern about issue, no change requested to report	Comment noted.
	The report should include means of evaluating Plan progress and adapting to unexpected changes	Adaptive management is important and it is described in the Monitoring chapter.
	The report needs effectiveness monitoring to develop better information for predicting the consequences of management actions and to develop wildlife-benefiting management alternatives	The Wildlife Action Plan acknowledges the limitations of wildlife and ecosystems information across the state. The broad need for resource assessment and monitoring is discussed in the Conservation Capabilities chapter. The Monitoring chapter describes the key elements of how monitoring needs to be done. Specific implementation elements will be developed during priority implementation.
	Watershed assessment needs to include riparian corridor (beyond just aquatic environment)	Edits were made in North Coast - Klamath chapter.
Oak woodland	The report should ensure oak woodlands are conserved; Work with counties on oak conservation	<p>The Wildlife Action Plan describes the importance of oak woodlands (Natural Diversity chapter) and their importance as an element of conservation for species at risk (Species at Risk chapter), conservation plans that address oak woodland conservation (Conservation Capabilities chapter), and stresses on this habitat (Central Coast, Central Valley, and Sierra Nevada - Cascades chapters). The Wildlife Action Plan intentionally describes actions to conserve many different habitats as a whole, including oak woodlands. Specific references to conserving oak woodland are in Central Coast Actions a, b, and d.</p> <p>The plan is intended as a framework or roadmap for implementing a series of actions designed to effect</p>

		conservation of declining and vulnerable species. Although the Department prepared the plan as part of a requirement to the U.S. Fish and Wildlife Service for State Wildlife grant funding, it is designed to be a comprehensive review of conservation actions and stressors that could be implemented by any agency or organization. Effective implementation of these actions will require partnerships between these agencies and organizations. The Department has established several productive inter-agency and non-governmental organization partnerships and will continue to promote these partnerships as part of its conservation mission.
Off road vehicles	It is difficult to find areas in urban regions for OHV use	Comment noted.
	General concern about issue, no change requested to report	Comment noted.
	Reader supports recommendations for better ORV management	Comment noted.
Old growth	The report should include a recommendation to promote old-growth forest characteristics in the Executive summary as well	Maintaining old-growth forest characteristics is adequately covered in the regional chapters.
Opposition to entire report	Reader objections to entire report	Comment noted.
Peer-reviewed sources	The report should build on knowledge of others; Cite more peer-reviewed sources; conduct more peer-review of the report;	The Wildlife Action Plan is intended as a framework or roadmap for identifying actions and stressors to effect conservation of declining and vulnerable species. It was designed to meet the requirements of the U.S. Fish and Wildlife for continued State Wildlife grant funding. The Plan is not intended as a complete or exhaustive review of available literature on any topic or issue area. The plan relies on a selection of literature that serves to illustrate a point or provide examples of issues. While the plan received considerable internal and external review by scientists and policy makers, formal peer review as defined for scientific publications is not required or appropriate.

Plants	Plants should be included in the report; the report should address native plant salvage as a strategy to achieving species conservation.	The State Wildlife Grant program specifically excludes plants.
Public land management	Don't transfer sensitive public lands to others (unless resources can be protectively managed)	Land transfers are one of several options for effecting conservation actions identified in the plan. If deemed the most effective and appropriate, land transfers would be conducted to meet specific conservation goals and therefore would have resource conservation as their primary objective..
	General concern about issue, no change requested to report	Comment noted.
Recreation	The report should build on knowledge of others; Cite more peer-reviewed sources; conduct more peer-review of the report;	The Wildlife Action Plan is not intended as a complete or exhaustive review of available literature on any topic or issue area. The plan relies on a selection of literature that serves to illustrate a point or provide examples of issues.
	There are not enough new recreational facilities in state	Comment noted.
Reserves	The report should recommend the establishment of reserves for deer	Comment noted.
Rivers	General concern about issue, no change requested to report	Comment noted.
Species at risk	Bighorn - The report should add a recommendation to implement the bighorn recovery plan	Significant resources are currently devoted to management and recovery efforts for the Peninsular bighorn sheep.
	Bighorn – The report provides minimal mention of Peninsular bighorn sheep	See Colorado Desert chapter for a description of bighorn sheep.



	Bighorn – The report misstates information about disease transmission	Corrective edits were made in the Colorado Desert chapter related to disease-transmission from livestock other than sheep.
	Bighorn – The report misses describing mountain lions and other important stressors, such as illegal immigration	The Wildlife Action Plan is not an exhaustive list of all stressors in a given region. Rather, it focuses on the most widespread stressors at the statewide and regional level. Additional stressors emphasizing local or regional issues, may be developed and considered during priority implementation.
	Burrowing owl - Maintain more public land as grassland for burrowing owls	Several regional conservation plans are starting to address burrowing owl conservation.
	The report should explain why only certain species selected for case study	Each regional chapter includes a discussion of two to three species at risk to illustrate how stressors or threats affect species and high-light conservation challenges and opportunities. These discussions are not intended to imply that conservation will have a single-species approach. Each regional chapter provides a broad list of at-risk species.
	General concern about issue, no change requested to report	Comment noted.
	Keep focus of this report on “species of conservation need”	Comment noted.
	Vernal pool grassland - the report should include a more robust review and discussion of issues	The Wildlife Action Plan already mentions this habitat in South Coast, Central Coast, and Central Valley chapters. A thorough discussion of the importance of every wildlife habitat in California to conserving declining and vulnerable species is beyond the scope of the plan.
Stressors	The report should better address human population growth	Comment noted.
	General concern about issue, no change requested to report	Comment noted.

Tone	The Department should not reference this report in statute (codify)	There are no plans at this time to reference the Wildlife Action Plan in statute.
	The report has too much spin and bias	Comment noted.
	The report needs to recognize growth will occur and residents needs must be met	Comment noted.
Water for wildlife	General concern about issue, no change requested to report	Comment noted.
	Use Federal Energy Regulatory Commission (FERC) process to bring flows back	Comment noted.
Water quality	General concern about issue, no change requested to report	Comment noted.
Wildlife-human interactions	The report should address road kill	The Wildlife Action Plan is not an exhaustive list of all stressors in a given region. Rather, it focuses on the most widespread stressors at the statewide and regional level. Additional stressors emphasizing local or regional issues, may be developed and considered during priority implementation.

## Specific Chapters

### I - Introduction

Implementation	The report should describe Conservation Strategy Special Project Team in more detail or involve us	The implementation team function, organization, and membership will be developed soon after finalizing the Wildlife Action Plan.
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### 2 - Species At Risk

Species at risk	The report needs to define "at risk" species	Corrective edits were made in Species at Risk chapter.
Stressors	Proper management, growth and development	Comment noted.

	can be compatible with wildlife	
<b>3 - Threats</b>		
Climate change	The report needs to acknowledge wildfire risk will increase with climate change	Comment noted.
Fire management	The report ignores extent of wildlife fire risk	The Wildlife Action Plan already describes wildfire risk. See the stressor sections of the North Coast - Klamath, Modoc, South Coast and Sierra Nevada - Cascades chapters.
	The report should use additional available fire models and data sets	The primary purpose of the plan is to identify species in most need of conservation, identify stressors related to population declines, and recommend actions that would effect conservation of those species. As such, describing specific modeling programs or approaches is beyond the scope of the plan.
	“Altered fire regime” is undefined	As part of the priority implementation process, the Department will consult with fire scientists and ecologists in addressing altered aspects of fire regimes within affected regions.
Grazing/ Working lands	The report needs to mention alternative incentives to reduced grazing on public lands	The primary purpose of the plan is to identify species in most need of conservation, identify stressors related to population declines, and recommend actions that would effect conservation of those species. As such, describing specific land-owner incentive programs is beyond the scope of the plan.
	The report uses undefined or inappropriate terms to describe grazing, agriculture, and forestry stressors; Concern about government prescribing grazing recommendations	The primary purpose of the plan is to identify species in most need of conservation, identify stressors related to population declines, and recommend actions that would effect conservation of those species. As such, describing beneficial activities or current conservation efforts, except in the context of developing appropriate actions, is beyond the scope of the plan. Terms are more clearly defined and described as a result of several edits throughout the document to provide clarity in describing conservation actions and stressors.
Stressors	The report should add disease as a stressor	The Wildlife Action Plan is not an exhaustive list of all stressors in a given region. Rather, it focuses on the most widespread stressors at the statewide and regional level. Additional stressors emphasizing local or regional issues, may be developed and considered during priority implementation.
Water for wildlife	Southern California water is affected by failing levees elsewhere	Comment noted.
<b>4 - Statewide Actions</b>		

Acquisition of land	The report should promote use of federal cooperative land-buffering	This recommendation is already included in the South Coast chapter (Action h), particularly around Camp Pendleton. It was also added to the statewide discussion as a conservation action.
Climate change	Climate change is beyond scope of report	Climate change is considered in a variety of land and resource planning efforts because of its broad conservation and land use implications.
	Conservation plans need to require mitigation for effects of climate change	The Governor's Climate Action Team report has a variety of mitigation actions related to climate change. More information is available online at <a href="http://www.climatechange.ca.gov/climate_action_team/reports/2006-04-03_FINAL_CAT_REPORT.PDF">http://www.climatechange.ca.gov/climate_action_team/reports/2006-04-03_FINAL_CAT_REPORT.PDF</a>
Fire management	The report should add tribal role in fire management actions	Corrective edits were made in Statewide Actions chapter.
Grazing/ Working lands	Need to protect agricultural land	Comment noted.
	The report should call for requiring mitigation for damage due to animal wastes and pesticides from agric/livestock	The focus of the plan is identifying primary stressors that contribute to declines and vulnerability of species requiring conservation, and describing actions that would result in benefits to these species populations. Developing mitigation measures for specific impacts such as animal waste discharge and pesticide use is beyond the scope of the plan but could be addressed during priority implementation.
Invasive Species	The report should recommend supporting legislation to prohibit deliberate introduction of invasive species and to eradicate harmful invasive species	All of the regional chapters, as well as the Statewide Actions chapter, list actions for controlling invasive species.
Landowner assistance	Not all public agencies have authority to provide incentives	Although not all agencies have this authority, several agencies do have this capability, and the use of those incentive programs needs to be expanded. Several action items (see Central Coast Action c; North Coast - Klamath Actions a, k and m; and Central Valley Action c) call for improved incentives. Existing incentive programs are listed in Appendix G.
Linkages of Habitat	The report should mention Missing Linkages Project; Expand linkages	Edits were made in Statewide Actions chapter.

	recommendation to statewide list	
Local and regional planning	The report should add "habitat value" to market value of property	This is a role of local government and, as such, is beyond the scope of the plan.
	The report should add the action "to provide assistance to local government" to statewide actions list	Edits were made in Statewide Actions chapter.
	The report should recommend the prohibit or significantly regulate the use of restoration projects by landowners as a strategy to "re-mitigate" areas	Some of the Department programs (for example, the fisheries restoration grant program) have a review process that prevents this kind of re-mitigation. The Department also reviews any potential mitigation property to assess its biological suitability, ownership, and current land use, as well as determining that it does not double up on mitigation for the same property. When appropriate, the Department may encourage project proponents or the mitigation land holder to apply for grant monies to fund restoration that would require habitat or species benefits above and beyond those specifically required for project mitigation.
	The report needs to mention preservation of green infrastructure along with other types of infrastructure	"Green infrastructure" is a term often used to refer to natural resources in general, as a natural counterpart to human infrastructure such as roads or energy facilities. The Wildlife Action Plan does not use this term, but the same concept is integrated into the document.
	The report needs to recommend integration with transportation planning	The Wildlife Action Plan recommends integrating transportation and conservation planning in Statewide Action c.
Monitoring, Assessment, and Adaptive Management	The report should include more information about detailed wildland assessments, such as the Forest and Rangeland Assessment Program (FRAP) assessment	The Wildlife Action Plan makes several references to FRAP and other assessment programs, which provided valuable information. This program will be a key partner in implementation to expand actions.

Priorities	The report needs a stronger and better documented analytical framework	The plan is intended as a framework for identifying those species most needing conservation and developing actions and approaches that could effect conservation. Although called a plan, the plan is, by design, a statewide framework and lacks the specificity typically found in a plan that is intended for direct implementation. The Department intends to develop priority implementation elements that would describe goals, objectives, and a better developed analytical framework.
Public land management	Don't transfer sensitive public lands to others (unless resources can be protectively managed)	Land transfers are one of several options for effecting conservation actions identified in the plan. If deemed the most effective and appropriate, land transfers would be conducted to meet specific conservation goals and therefore would have resource conservation as their primary objective.
Riparian	The report should expand riparian buffer zones	Conservation of riparian habitat and other habitats will take into account local and regional needs, including factors such as the appropriate buffering distance, absolute buffer width, minimum size to meet the habitat needs of target conservation species, and other factors.
Species at risk	The report should include description of adaptive management	The Monitoring chapter describes importance of adaptive management.
	Tricolored Blackbird - The report has incorrect IUCN status information	The plan does not list the IUCN status for tricolored blackbird.
	Tricolored Blackbird - The report should provide description of bird as a highlighted species at risk	The Department is a member of the tricolored blackbird/silage working group that is contributing to a draft conservation strategy for the species. This strategy will identify priority issues and measures intended to conserve the species and to avoid the need to list it as under the state or federal endangered species acts. State Wildlife Program funds would be one source of funds to develop and implement this conservation strategy.
Stressors	Development is a greater threat than infrastructure projects	Comment noted.

Water for wildlife	The report should clarify that it is the State Water Resources Control Board's (SWRCB) role to track diversions and monitor compliance permitted water rights	The role of SWRCB is described several places, including Mojave Desert Action d, Central Coast Actions f and g, North Coast - Klamath Actions b and c, Sierra Nevada - Cascades Action m, and Marine Action b.
Water quality	The report needs to describe importance of water quality standards	The Wildlife Action Plan currently describes importance of water quality. Please see the following actions: Statewide Action h; Central Valley Actions d, n and o; Colorado Desert Action a; South Coast Action f; and Central Coast Actions b and h. Impaired water quality is also listed as a stressor in the Colorado Desert, Central Coast, North Coast - Klamath, Modoc, and Central Valley chapters
Wildlife-human interactions	The report needs to address issue of wildlife/human conflicts	Edits were made in Statewide Actions chapter.

## 5 - Monitoring

Local and regional planning	The West Mojave plan should include conservation of critical private lands, over-reliance on public land	As described throughout the Wildlife Action Plan, most conservation actions will be implemented through partnerships between public and private organizations. These partnerships will be designed to seek the conservation measures identified as most effective in meeting conservation goals and may include actions on both public and private lands. Large-scale conservation efforts such as the West Mojave Plan address conservation needs on a regional basis and involve public and private partners in planning and decision-making roles to ensure balanced approaches to conservation.
Monitoring, Assessment, and Adaptive Management	The report should assess sufficiency of current monitoring efforts and identify key gaps	Effectiveness assessment of current monitoring efforts is beyond the scope of the plan but it will be considered as part of priority plan implementation.
	The report should describe a monitoring project tracking database in the plan	Developing a database for tracking project monitoring is beyond the scope of the plan but it will be considered as part of priority plan implementation.
	Agencies need to improve baseline data on species	Improving baseline information is a key mission of many existing data and monitoring programs. Given continued funding, these programs will continue to improve data and information about species.
	The report should provide information about assessment projects	The monitoring chapter and appendices describe some of these efforts, but the Wildlife Action Plan is not intended to be an exhaustive review. The online monitoring project matrix provides more information about existing efforts.

The report should provide more information about monitoring goals and how actions will be monitored	The monitoring chapter describes the key elements of an adaptive monitoring program. Priority plan implementation will consider development of these concepts into specific action-based monitoring programs.
The Department should provide spatial information about monitoring efforts	The Department is developing an online spatial data tool to improve access to biological data ( <a href="http://www.BIOS.dfg.ca.gov">www.BIOS.dfg.ca.gov</a> ) including monitoring data. The system is currently available and information and new data will be added as the system continues to expand over time.
Reader supportive of collaborative monitoring process of conservation actions	Comment noted.
The report should provide more information about monitoring goals and how actions will be monitored	The monitoring chapter describes the key elements of an adaptive monitoring program. Priority plan implementation will consider development of these concepts into specific action-based monitoring programs.

## 6 – Conservation Capabilities

Enforcement	The report needs to recommend improved cooperation between courts and Department	The primary purpose of the plan is to identify species in most need of conservation, identify major stressors related to population declines, and recommend actions that would effect conservation of those species. As such, making such specific recommendations is beyond the scope of the plan
Local and regional planning	The report should recognize that the California Environmental Quality Act (CEQA) helps protect wildlife	The report briefly describes the role of existing laws and regulations in effecting conservation. CEQA is one of many regulatory tools that can be used in combination with partnerships and collaboration to meet conservation objectives. Priority implementation planning will address the role of CEQA and other laws as appropriate.
	The report should recommend supporting legislation to keep local government and landowners accountable to State for conservation compliance	Existing legislation and regulations (Endangered Species Act, CEQA, NCCP, etc) already provides some of this accountability.
Mapping priority areas	The report needs to describe California Important Bird Areas in	The California Bird Area document identifies geographic regions considered important to conserving declining and vulnerable bird populations. It is one of many of these kinds of assessments that will be considered as more specific implementation goals and objectives are established.



	greater detail	
Monitoring, Assessment, and Adaptive Management	This project should involve all stakeholders in comprehensive program that coordinates wildlife activities	The Department held a series of public workshops as part of the Resources Agency Legacy Project during 2002 and 2003 that addressed most of the issues and actions contemplated in the plan. The comments received during this broad public involvement effort were incorporated into the draft plan. In addition, the Department conducted three public workshops to gather input on the draft and made the draft available on the Department web site for public review. The Department intends to fully engage the public as part of priority implementation.
	The report needs to mention of cooperative vegetation mapping and monitoring	Corrective edits were made in the Conservation Capabilities chapter.
<b>7 - Mojave</b>		
Funding	The report should recommend that adequate Green Sticker funding is ensured throughout state	Priority implementation will identify, as appropriate, key funding needs and opportunities.
Grazing/ Working lands	The report needs to acknowledge large removal of horse and burros	Mojave Desert chapter recognizes the progress in removing burros.
Invasive Species	The report should describe link between invasive species and increased fire risk	The Mojave Desert chapter describes the relationship between invasive species and increased fire risk.
Local and regional planning	The report should recognize that BLM issued a Record of Decision on the West Mojave Plan in March 2006	The Wildlife Action Plan already describes the release of the West Mojave Plan in the stressors section of the Mojave Desert section.
Military Lands	The report should acknowledge role of military	Comment noted.
	Military is not the only conservation option in the desert	The Mojave chapter describes the conservation role of other agencies in this region. The military is small part of the recommendations in this chapter.

Off road vehicles	Finding additional OHV areas will be difficult; focus on improving education of users	Comment noted.
	Need to buffer lands from OHVs	This can be discussed in the development of a Southern California Outdoor Recreation Plan. See Colorado Desert Action f and South Coast Action k.
	Reader supports recommendations for better ORV management	Comment noted.
	Reduced OHV access hasn't benefited wildlife	Comment noted.
	The report ignores direction of CDCA and allocation of OHV use into selected areas to benefit other places	The Wildlife Action Plan recognizes the importance and value of the California Desert Conservation Area (CDCA) Plan in the Mojave Desert chapter. Specific examples were provided in this Wildlife Action Plan to elaborate on the effects occurring in the Mojave Desert and other regions. The Department fully acknowledges the recreational value of OHV use, and implementation of the action will take this into account both in the Mojave Desert and other regions.
Plants	Plants should be included in the report; the report should address native plant salvage as a strategy to achieving species conservation	The State Wildlife Grant program specifically excludes plants.
Public land management	The report should describe role of Desert Protection Act in protecting natural resources	A summary of the California Desert Conservation Area (CDCA) Plan is provided in the Mojave Desert chapter. There is insufficient room in the Wildlife Action Plan to describe it more comprehensively and to duplicate this description in the Colorado Desert chapter.
	The report should highlight the different missions of the public land managing agencies; The report reflects bias toward a refuge dominated management philosophy without describing other	Corrective edits were made in the Colorado Desert and Mojave Desert chapters.

	land management options	
	The report should call for improvements in NPS wildlife management	Priority implementation is the appropriate venue to address specific terms or actions regarding NPS or any other entity within the Mohave Desert Region. The Department will continue to work with NPS and the scientific community to ensure the best data and analyses are let to managing both water and wildlife.
	The report should recommend supporting Rural Schools and Community Self-Determination Act	The primary purpose of the plan is to identify species in most need of conservation, identify stressors related to population declines, and recommend actions that would effect conservation of those species. As such, describing specific funding programs is beyond the scope of the plan.
Riparian	Riparian protection does not rely on enforcement of wetland regulations	Corrective edits were made in the Mojave Desert chapter.
Southern California Outdoor Recreation Plan	The report needs to address and build on California Outdoor Recreation Plan; Southern California plan should address target-shooting, suction-dredging, and promote alternative ways to reduce impacts of OHVs	The California Outdoor Recreation Plan provides a valuable framework for a southern California recreation plan. These issues can be addressed as implementation of such a regional plan gets underway.
Species at risk	Tortoise - Grazing not currently a significant threat to tortoise; Include an action to address raven predation on tortoises; Report is missing important research findings	The Department acknowledges the long and challenging efforts to recovery desert tortoise. In its 2005 report on the status of State-listed species, the Department concluded the species is still in decline. It is hoped that through continued implementation of the recovery plan, the Northern and Eastern Colorado Desert Coordinated Management plans, West Mojave Plan, and the Coachella Valley MSHCP will halt the decline and eventually recover the species.

	Tortoise - The report should mention tortoise in Colorado section	Corrective edits were made in the Colorado Desert chapter.
	Tortoise - The report needs to recognize risk of disease related to tortoise	Disease, as well as other actual or potential threats, is being addressed, or will need to be addressed, through continued implementation of the recovery plan and other conservation planning efforts.
Stressors	The report should include energy development as a stressor	The Wildlife Action Plan is not an exhaustive list of all stressors in a given region. Rather, it focuses on the most widespread stressors at the statewide and regional level. Additional stressors emphasizing local or regional issues, may be developed and considered during priority implementation.
Stressors	Wildlife stressed by more than OHVs, such as oil spills	Comment noted.
<b>8 - Colorado</b>		
Local and regional planning	The report should provide more attention to Lower Colorado plan, in both Colorado and Mojave sections	Edits were made in both desert sections to provide references to the water-related habitat conservation plans (Lower Colorado River Multi Species Conservation Plan and Salton Sea and Imperial Valley Habitat Conservation Plan) in the Action title. The plan uses sidebars to draw more attention to specific topics, as in the case with the Lower Colorado plan, rather than less attention.
	Permitting agencies have little control over new infrastructure project proponents. Redraft recommendations to reflect the reality of a private sector initiative process and the current emphasis on providing renewable energy sources	Comment noted.
Public land management	The report should update Algodones Dunes action to include new information	Discussions related to Algodones (Imperial) Dunes were underway during preparation of the Wildlife Action Plan. The results of these discussions can be incorporated in more specific implementation actions during that phase of this project.
<b>9 - South Coast</b>		

Fire management	There are many important reports, such as the National Fire Plan, that can be consulted to improve fire management practices	Comment noted.
	The report should provide more information about how to reduce risk of wildfire	The primary purpose of the plan is to identify species in most need of conservation, identify stressors related to population declines, and recommend actions that would effect conservation of those species. As such, describing specific approaches to reduce fire risk is beyond the scope of the plan.
	Public needs to recognize it is hard to protect everyone in major fire events	Comment noted.
	Reseeding with natives not always best	Much of the published material and experience support the use of native plants because these species usually have the only chance of still being present after rain events sufficient enough to cause erosion and sliding. Availability can be a problem, but is becoming less of a problem. As more resource agencies highlight the advantages of native seed, the supply would likely increase and the cost decrease.
Hunting and fishing	Natural Community Conservation Plans (NCCPs) are inappropriate as "primary" process because they prohibit hunting in reserve areas	The management of conserved lands varies from situation to situation, depending on the land's specific conservation goals and other factors (such as public recreation and safety). In addition to its goal of protecting all species of wildlife, the Department actively promotes hunting where it is appropriate and safe.
Invasive Species	Brownheaded cowbird was not introduced to California	Edits were made to clarify that the cowbird was not intentionally introduced to California. However, although the cowbird is native to other parts of North America, it is not native to California. As agriculture and human development expanded, opening up forest and woodland landscapes, the species expanded its range, including into California.
	The report fails to discuss the spread of the European Starling and its effect on native wildlife	Corrective edits were made in South Coast chapter.

	The report needs to elaborate more on invasive species and how they were introduced to California	The Wildlife Action Plan addresses invasive species eradication and control as a priority action. Further elaboration of approaches and techniques that may be used to meet conservation objectives is beyond the scope of this document and may be addressed as part of the priority implementation process.
Linkages of Habitat	The report should promote wildlife linkages and provide more information about linkages, including analysis of mitigation fragments, value of power line corridors, specific locations; identify role of large public land managers and assist them in protecting linkages	The Wildlife Action Plan provides a statewide action (d) regarding wildlife linkages, calling for more analysis of these areas and increased attention to conserve them. These actions can be further developed during the implementation phase of this Project to provide more specific conservation guidance.
Local and regional planning	The report should ensure that plans are collaborative, rather than imposed by others	The Wildlife Action Plan emphasizes collaborative approaches in multiple locations throughout the report. Collaborative solutions are an essential element to solving many of the challenges that California's wildlife face.
	The Natural Community Conservation Plan (NCCP) description is contradictory by focusing on single-species, rather than natural community	The NCCP description briefly uses one species to illustrate how the NCCP program has evolved. The bulk of this description emphasizes the importance of broad multi-species and regional ecosystem approaches to NCCP implementation and conservation.
Military Lands	The report should add Department of Defense acreage to the list of public lands	Corrective edits were made in South Coast chapter.
	Add information about birds at Pendleton	Corrective edits were made in South Coast chapter.
	The report should describe other military lands	Corrective edits were made in South Coast chapter.

	The report should mention the Pendleton management plan	Corrective edits were made in South Coast chapter.
Monitoring, Assessment, and Adaptive Management	The Department should provide adequate training for use in upcoming data system	The primary purpose of the plan is to identify species in most need of conservation, identify major stressors related to population declines, and recommend actions that would effect conservation of those species. As such, describing specific data system training is beyond the scope of the plan
Native American involvement	The Department should include an active role for tribes in plan implementations	The Department will continue to reach out and provide opportunities for tribes to engage in conservation planning.
Public land management	Public land management plans take away recreational opportunities	Individual public lands typically have their own specific land management plans that are developed consistent with the mission of the managing agency and the specific objectives of the land. Where recreation is appropriate, these individual plans typically outline the types and nature of recreational opportunities.
	The report should provide more emphasis on collaboration and incentives; Expand discussion of positive examples; mention non-State conservation efforts on private lands	The Wildlife Action Plan promotes collaboration in many different places. It recognizes multiple uses on public land and one of the Department's goals is to promote wildlife conservation as one of those uses.
Recreation	Reader supports a collaborative approach to recreation program planning	Comment noted.
	The report needs to describe positive/negative pressures related to hunting/poaching/recreation	The Wildlife Action Plan is not an exhaustive list of all stressors in a given region. Rather, it focuses on the most widespread stressors at the statewide and regional level. Additional stressors emphasizing local or regional issues, may be developed and considered during priority implementation.
Riparian	The report needs to mention other values of riparian areas	Edits were made in South Coast chapter.

Southern California Outdoor Recreation Plan	Include hunting activities in any outdoor recreation plan	The Wildlife Action plan addresses identification of species with the greatest conservation need and develops recommended actions to meet this need. While plan actions focus on non-game wildlife, all species would benefit from the conservation actions contemplated in the plan. In addition to conservation and management of non-game wildlife, the Department is mandated to provide recreational angling opportunities and has programs in place to minimize conflicts between providing these recreational opportunities and natural resource conservation.
	The report needs to address and build on California Outdoor Recreation Plan; Southern California plan should address target-shooting, suction-dredging, and promote alternative ways to reduce impacts of OHVs	The California Outdoor Recreation Plan provides a valuable framework for a southern California recreation plan. These issues can be addressed as implementation of such a regional plan gets underway.
Species at risk	Light-footed Clapper Rail - Provide opinion on captive breeding work	The Department has been tracking the progress of this captive breeding program. More monitoring is needed to assess the program's effectiveness.
Stressors	The report needs to correct statements about Transportation Corridor Agency's Corridor Project	Corrective edits were made in South Coast chapter.

## 10 - Central Coast

Grazing/ Working lands	The report needs more research on effects of livestock in riparian areas	The Wildlife Action Plan is not intended as a complete or exhaustive review of available literature on any topic or issue area. The plan relies on a selection of literature that serves to illustrate a point or provide examples of issues.
	The report should mention sources of information about appropriate grazing practices that can be used	Edits were made in Central Coast chapter.
	The report uses outdated information about the impact of grazing in vernal pools and riparian; Red	The USFWS 2006 reference for critical habitat for the red-legged frog was added, but the Wildlife Action Plan is still consistent with the position of the USFWS regarding excessive grazing.



	legged frog not stressed by grazing	
Rivers	The report should name specific rivers for protection	The Wildlife Action Plan already identifies the rivers on a list in this chapter.
Stressors	The report should address other stressors in this region, including climate change, sudden oak death, and altered fire regime	The Wildlife Action Plan is not an exhaustive list of all stressors in a given region. Rather, it focuses on the most widespread stressors at the statewide and regional level. Additional stressors emphasizing local or regional issues, may be developed and considered during priority implementation.
Water for wildlife	The report should note that there are legal limitations to procuring these water rights	Edits were made in Central Coast chapter.
	The report erroneously reports the normal pop level of steelhead in Santa Ynez River	USFWS in 1991 estimated the run in Santa Ynez River to be 20,000. The Department's 1940 publication describes populations of juvenile steelhead to number in the 100,000s. This comment provides a new perspective which suggests that more research is needed on historical population levels.
Water quality	Dairies are not significant contributors to water quality issues in Morro Bay	Corrective edits were made in Central Coast chapter.
	Elevated water temperatures are not related to mining operations	Corrective edits were made in Central Coast chapter.
<b>II - North Coast Klamath</b>		
Forest management	Forestry incentives are better than ordinances to reduce fire risk	Comment noted.

	The report needs to explain how forestry operations, which already tailored to different ecosystems, need to be different	The Department acknowledges that California Forest Practice Rules (CFPR) include several forest districts and that harvest plans do address various characteristics and qualities of forests, including density, canopy layers, and riparian vegetation. The Action Plan recommendation focuses on the important species composition and interactions differences that exist in different ecosystems. Ecosystems are not addressed by CFPR.
Local and regional planning	The report should recommend developing and implementing recovery plans for listed salmonids; more urgent than regional recovery plans	Edits were made in North Coast - Klamath chapter.
Water for wildlife	Changing current flow regimes may be detrimental to the existing chinook run; Increased flows may not always benefit fish	The action clearly states that increases in flow or replication of natural flow regimes should be taken "where insufficient or altered flow regimes limit populations of salmon, steelhead and other sensitive aquatic species". If fish and other aquatic species are not limited by the current flow regime, changing the flow may not be appropriate.
<b>12 - Modoc</b>		
Grazing/ Working lands	Grazing doesn't threaten bighorn	Published evidence shows that nose-to-nose contact occurred between the sheep at Lava Beds and domestic sheep immediately prior to that die-off. Although no such observation was made in the Warner Mountains, that die-off is consistent with what would be expected in a disease event that involved transmission of diseases from domestic sheep to wild sheep, and the Warner Mountains are heavily grazed by domestic sheep. In its bighorn sheep recovery efforts, the Department will no longer introduce bighorn sheep into areas where contact with domestic sheep is probable because of what has been learned from die-off events. Discussions with Dr. Anette Rink, Laboratory Supervisor for the Nevada Animal Disease and Food Safety Laboratory also clarified that the species should not be mixed on the range. To prevent future die-offs, there is consensus that a cautionary approach is prudent to the recovery bighorn sheep.

	Reader appreciated overpopulation of wild horses and burros	Comment noted.
	Reader appreciated that the report recognizes rancher efforts improve riparian conditions	Comment noted.
	Reader support the recommendation that feral horses be controlled	Comment noted.
	The report needs to acknowledge that range conditions and grazing practices continue to change	The Monitoring chapter acknowledges continual change by promoting use of adaptive management.
Invasive Species	The report should update information about Eurasian water Milfoil	Corrective edits were made in Modoc chapter.
Species at risk	Sage Grouse - The report needs better distinction between grouse status in areas with different management	The primary purpose of the plan is to identify species in most need of conservation, identify stressors related to population declines, and recommend actions that would effect conservation of those species. As such, describing site-specific conservation status information is beyond the scope of the plan.
Water quality	Sediment is causing the decline of wildlife habitat in the Fall River	This concern can be addressed in aquatic conservation planning for Pit River as described in recommendation, which needs to include water quality concerns.
<b>I3 - Sierra Nevada - Cascades</b>		
Grazing/ Working lands	Magnitude of grazing is overstated	According to Menke's research, as described in the Sierra Nevada Ecosystem Program report, excessive grazing still remains an issue for wildlife, although practices have improved significantly since earlier in 1900s.

Amphibians and Trout Planting	Amphibians - need to remove non-native fish from threatened amphibian habitats; The report should remove recommendation to improve trout fisheries in lakes with declining amphibians	This is one of the actions in the Sierra Nevada - Cascades Chapter. The Wildlife Action plan addresses identification of species with the greatest conservation need and develops recommended actions to meet this need. While plan actions focus on non-game wildlife, all species would benefit from the conservation actions contemplated in the plan. In addition to conservation and management of non-game wildlife, the Department is mandated to provide recreational angling opportunities and has programs in place to minimize conflicts between providing these recreational opportunities and natural resource conservation.
Fire management	The report should add another action that promotes reassessing Wildland-Urban Interfaces (WUIs) in community fire protection plans	The Wildland-Urban Interface is of considerable importance to wildlife and addressing priorities on both sides of the WUI, as well as the suitable habitat within it, is an important conservation topic. Other land management responsibilities, including public safety, are already worked into Department land planning and will continue to be integrated as the Action Plan is implemented.
	Altered fire regimes affect our supply traditional plant materials	Improvements to fire management are mentioned in the Wildlife Action Plan. See Sierra Nevada - Cascades Actions d, e, and h.
	Fire risk is more significant than the negative effects of active management	More analysis is needed to evaluate the cumulative effects of wildfire risk to wildlife habitat. This can be part of more detailed implementation steps for these actions.
	The report should highlight need for forest thinning to maintain vegetative density	Forest thinning techniques are a useful component to forest health improvement. As the implementation phase is developed for the Sierra Nevada/Cascades Region, the Department will work with knowledgeable and experienced entities in developing forest health improvement priorities and actions.
Forest management	Reader supports recommendation for improved forest management	Comment noted.
Invasive Species	Invasive fish - general concern - No change requested	Comment noted.
Riparian	Aquatic and riparian are not the most altered and impaired habitat in Sierra	Corrective edits were made in Sierra Nevada - Cascades Chapter.

Species at risk	Pacific fisher - inappropriate fuels management (preserving all current vegetation) may increase wildfire risk to fisher habitat	The Wildlife Action Plan mentions appropriate fuels management as an important action in Sierra Nevada - Cascades Actions d, e, and h.
	Pacific fisher - not all types of forest management is a stressor; it is not an old growth surrogate; many uncertainties still exist	<p>Fishers have been documented in managed forest landscapes, both on public and private lands. However, “managed forests” is a relative term, and various harvest methods and late seral retention standards will determine if fisher can exist and persist on the managed landscape. The checkerboard pattern of federal and private ownership in California also makes it difficult to quantify fisher habitat relationships, especially beyond the stand level. It is imperative to manage forests at a large landscape level in order to be managing for fisher population persistence in the long term, and not just to provide for dispersal habitat for one individual fisher.</p> <p>More work is needed to quantify fisher habitat elements in managed landscapes and to characterize the forest conditions needed over several watersheds. Much work has been done at the rest site or den site level, and home range sizes are known, but the landscape conditions that will contribute to fisher population viability need further study.</p>
	Pacific fisher - The report needs to clarify description of historical distribution in Sierra	Corrective edits were made in Sierra Nevada - Cascades Chapter.
	Pacific fisher – The report oversimplifies stressors that affect fishers	Edits were made in Sierra Nevada - Cascades Chapter.
Stressors	The report should integrate discussions of individual stressors and provide a collective, landscape-scale discussion in the Action Plan.	As a framework for describing stressors and actions, the Wildlife Action Plan identifies the most important stressors to declining and vulnerable wildlife populations and related actions that could result in stemming declines or reducing vulnerability. Integration of these stressors and actions into a cohesive, workable plan will take place when priority plan implementation begins and will be the foundation upon which priority decisions are made.
	The negative language of the report suggests	Comment noted.

	impractical return to historical conditions	
<b>I4 - Central Valley Bay Delta</b>		
Grazing/ Working lands	Reader support of Williamson Act	Comment noted.
Invasive Species	More public participation is needed in controlling invasive species	The Department held a series of public workshops as part of the Resources Agency Legacy Project during 2002 and 2003 that addressed most of the issues and actions contemplated in the plan. The comments received during this broad public involvement effort were incorporated into the draft plan. In addition, the Department conducted three public workshops to gather input on the draft and made the draft available on the Department web site for public review. The Department intends to fully engage the public as part of priority implementation.
	Brownheaded cowbird was not introduced to California	Edits were made to clarify that the cowbird was not intentionally introduced to California. However, although the cowbird is native to other parts of North America, it is not native to California. As agriculture and human development expanded, opening up forest and woodland landscapes, the species expanded its range, including into California.
Landowner assistance	Conservation Reserve Program has little value in California. The report should focus on other Farm Bill programs	Edits were made in Central Valley chapter.
	Need to protect farmers from problems due to adjacent wildlife areas (Safe harbor)	The primary purpose of the plan is to identify species in most need of conservation, identify stressors related to population declines, and recommend actions that would effect conservation of those species. As such, recommendations concerning agricultural assurances are beyond the scope of the plan
	Reader supports recommendation for private landowner assistance	Comment noted.
Local and regional planning	The report should include more information about Central Valley Habitat Joint Venture	Information from this effort can be included in future revision to of the Wildlife Action Plan when the Joint Venture's plan is completed.

Rivers	Planting riparian in floodways and bypasses can have negative effect on flood safety; Systematic setbacks and realignments along all rivers is too much and should be done only under certain conditions	Comment noted.
Species at risk	Swainson's hawk - No scientific evidence to support a broad-brush approach to criminalizing taking of unoccupied Swainson's hawk nests	Edits were made in Central Valley chapter.
Stressors	The report should expand the fragmentation discussion to include more information	This Wildlife Action Plan is intended as a framework for identifying those species most needing conservation and developing actions and approaches that could effect conservation. Although called a plan, the plan is, by design, a statewide framework and lacks the specificity typically found in a plan that is intended for direct implementation. A discussion addressing habitat fragmentation and its effect on wildlife populations may be included as part of priority plan implementation.
Tone	The report makes unsupported statement about mouse	Corrective edits were made in Central Valley chapter.
Water for wildlife	The report should note that there are legal limitations to procuring these water rights	Edits were made in Central Coast chapter.

## 15 - Marine

Funding	The report should oppose efforts to redirect Tidelands funds	The Wildlife Action Plan identifies the need for additional funding for wildlife programs. However, advocating or opposing specific funding mechanisms is beyond the scope of the plan.
Local and regional planning	The report should oppose efforts to use wetlands for other inappropriate purposes	The Wildlife Action Plan provides recommended actions to improve management and restoration of wetlands in the Central Valley - Bay Delta and the Marine Region chapters.

Marine Fishing	The report should not equate fishing with over fishing	Edits were made in Marine chapter.
	The report should expand the discussion of restoration beyond watersheds and wetlands to all ecosystems	Action e in the Marine chapter includes support for restoration work in the marine environment in addition to wetlands and watersheds. The details of restoration approaches can be addressed in implementation efforts.
	The report is missing important research findings; Include more information about current progress	Corrective edits were made in Marine chapter to use the cow cod example rather than the more controversial sheep head example. The Wildlife Action Plan recognizes the Marine Life Management Act which includes traditional fishery management and ecosystem-level approaches to marine life management.
	The Department should prevent private interests from controlling partnership planning efforts	Comment noted.
	The report incorrectly implies that eelgrass policy includes permanent protection of other beds	Corrective edits were made in Marine chapter to be consistent with Southern California Eelgrass Mitigation Policy.
	The report needs better description of abalone stressors and current management	The Marine chapter describes health of the northern California abalone fishery and describes why it is healthy. The Wildlife Action Plan appropriately discusses the serial depletion of California abalone species, and it acknowledges the well-managed red abalone on the North Coast.
	The report needs better description of murre stressors and current management	The common murre discussion adequately discusses stressors and how some net conflicts have been reduced. The Wildlife Action Plan is not an exhaustive list of all stressors in a given region. Rather, it focuses on the most widespread stressors at the statewide and regional level. Additional stressors emphasizing local or regional issues, may be developed and considered during priority implementation.
	The report should consider social and economic factors	Edits were made in the Marine chapter to indicate Marine Life Management Act also attempts to minimize adverse impacts on the fishing community.
	The report should emphasize the use of currently available management tools to	Edits were made to replace the term "reserves" in text to "marine protected areas", indicating broader options pursuant to the Marine Life Protection Act.



	address marine species at risk, rather than emphasizing reserves	
	The report generally neglects traditional fisheries management measures as methods to achieving the report's goals	Edits were made to the Marine chapter to address this concern. The Wildlife Action Plan recognizes the Marine Life Management Act which includes traditional fishery management and ecosystem-level approaches to marine life management.
	The report places too much emphasis on negative impacts of recreational fishing	USFWS requires the Wildlife Action Plan to address stressors that negatively impact wildlife and habitats. The Wildlife Action Plan attempted to go beyond this requirement and highlight positive examples as much as possible. The Introduction chapter recognizes the value of various human activities related to wildlife.
	The report provides a simplistic misleading impression of the overall health of the Pacific Ocean adjacent to California	The Wildlife Action Plan appropriately makes the point that significant changes are needed in marine life management.
	The report has an unsupported statement about fishing stressors	Corrective edits were made in Marine chapter.
	The report should recommend more enforcement of the protection of seals in San Diego	The Wildlife Action Plan is not an exhaustive list of all stressors in a given region. Rather, it focuses on the most widespread stressors at the statewide and regional level. Additional stressors emphasizing local or regional issues, may be developed and considered during priority implementation.
	The report has an unsupported statement about significance of net entanglement issue	As the Wildlife Action Plan states, fishing gear entanglement remains a threat for non-target birds and marine mammals.
Monitoring, Assessment, and Adaptive Management	The report should recommend redirection of Sport Fish in Restoration Act funding towards	The primary purpose of the plan is to identify species in most need of conservation, identify stressors related to population declines, and recommend actions that would effect conservation of those species. As such, describing funding redirection or support of specific monitoring approaches, except in the context of developing appropriate actions, is beyond the scope of the plan.

	recreational fishing monitoring; support implementation of ocean monitoring technology for salmon recovery actions	
	The report needs to improve monitoring of commercial fisheries	The Wildlife Action Plan recommends expanding stock assessments and improving assessment of fishery condition.
Protected Areas	The report needs to revisit current marine reserve designations	The primary purpose of the plan is to identify species in most need of conservation, identify stressors related to population declines, and recommend actions that would effect conservation of those species. As such, recommendations concerning specific marine protected areas are beyond the scope of the plan.
	Marine Protected Areas are an unsupported method for recovery the listed species at risk	Much work is needed to evaluate species at risk in the marine environment. As additional assessment work is completed on marine species, the state special status species list will be updated.
	The report should change "marine reserves" to "marine protected areas" to reflect California law	Corrective edits were made in Marine chapter.
Predators as stressor	Modify the report's recommendation to control predators by considering social and economic costs where mainland beaches serve as important access and/or recreational use areas	The primary purpose of the plan is to identify species in most need of conservation, identify stressors related to population declines, and recommend actions that would effect conservation of those species. As such, recommendations concerning socioeconomic issues are beyond the scope of the plan. These may be addressed during priority implementation as appropriate.
Stressors	The report should describe abnormal population levels of birds and mammals as stressor; which may be more significant than entanglement issue	<p>The entanglement in nets is well document as a major cause of common murre mortality. The Wildlife Action Plan discusses the impact of predation on seabirds generally, particularly by introduced predators.</p> <p>The Wildlife Action Plan is not an exhaustive list of all stressors in a given region. Rather, it focuses on the most widespread stressors at the statewide and regional level. Additional stressors emphasizing local or regional issues, may be developed and considered during priority implementation.</p>

Water quality	The report should add recommendation to protect marine habitats from watershed effluents	The Wildlife Action Plan is not an exhaustive list of all stressors in a given region. Rather, it focuses on the most widespread stressors at the statewide and regional level. Additional stressors emphasizing local or regional issues, may be developed and considered during priority implementation. This is an issue to be addressed by the regional water quality boards.
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## Appendix A

Stressors	The report fails to meet the reporting requirement on stressors because discussion is not based on science	The Wildlife Action Plan references many scientific documents, as well as planning documents that are themselves based on science. The Wildlife Action Plan is not intended as a complete or exhaustive review of available literature on any topic or issue area. The plan relies on a selection of literature that serves to illustrate a point or provide examples of issues.
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## Appendix F

Invasive Species	Agriculture does not get disproportionate share of attention on Invasive species control	Comment noted.
	There are many difficulties in invasive species coordination and funding between agencies at the state level	A complete discussion of funding mechanisms and coordination of funding efforts is beyond the scope of this document. As discussed previously, the Department will seek opportunities for collaborative funding programs and work towards coordinating these programs within the context of implementing priority plan elements.
Public participation	The report should clarify role of recommendations in Appendix F	Information provided in Appendix F is background information. The Wildlife Action Plan used many ideas from these workshops in developing recommendations, but not necessarily all of them.
Water for wildlife	There is no need to recommend a public trust advocate office at the State Water Resources Control Board	This is a suggestion from one of the workshops included in Appendix F, and it is not a recommendation of the Wildlife Action Plan. Not all of the workshop suggestions were included as part of the Plan's recommendations.